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BY ECF

Honorable Harvey Bartle III, U.S.D.J.
United States District Court
Eastern District of Pennsylvania
16614 U.S. Courthouse
601 Market Street
Philadelphia, Pennsylvania 19106

Re: *Atlas Data Privacy Corporation, et al v. Restoration of America., et al.*
Case No. 1:24-cv-04324-HB
Defendants' Motion to Dismiss Plaintiffs' Complaint

Dear Judge Bartle:

This firm represents the defendants Restoration of America and Voter Reference Foundation LLC ("Defendants") in the above-referenced matters. With regard to our motion dated June 14, 2024, we met and conferred with counsel for Plaintiff's regarding whether our motion was opposed. Counsel indicated our motion was indeed opposed and referred me to the Opposition to the Consolidated Motion to Dismiss (Dkt. No. 55). There is no specific argument contained in Dkt. No. 55 that references the as applied challenge from these Defendants nor any arguments regarding Defendants or preemption in that filing that we could locate.

Respectfully submitted,

/s/ John E. MacDonald

John E. MacDonald
Partner & Office Head, Cybersecurity & Data Privacy Team